

**Transmission Business Policy EIS
Portland Scoping Meeting
January 13, 2004**

Written comments submitted to comment box:

“The Transmission EIS should look first of all to establishing BPA as the primary transmission provider for all electric utilities in the Pacific Northwest. BPA should have the authority and the physical ability to move all existing generation and all additional generation which comes on the line in the Pacific Northwest at any future time from the generating stations to the load centers, regardless of the ownership of the generating plants. To this end, BPA should be authorized additional borrowing authority of at least \$15 billion to be invested in additional transmission line construction, reconstruction, and acquisition. The bonding authority should rollover so that as BPA pays off bonds, the borrowing authority is restored. BPA should thus be able to maintain as a first rate operation the only extra high voltage transmission grid for the entire Pacific Northwest and ensure it will serve the public interest.

This would involve in particular BPA constructing a 500 kV line from the main grid into Southern Idaho to tie in the existing BPA transmission there and enabling the flow of power to and from that area to the rest of the Pacific Northwest.

This also would involve strengthening the existing BPA transmission grid so that it can meet current needs and is prepared to move all additional generation which comes on the line into the indefinite future.

BPA should also consider the viability of acquiring all existing non-BPA extra-high voltage transmission in the Pacific Northwest and integrating it into its grid system.

The Bonneville Power Administration should become the only regional transmission agency for the Pacific Northwest. Federal ownership and control of the grid is the only way we can assure that the grid will be operated AT COST honestly and fairly to serve all the people of this region and to tie into a national grid system.”

Comments Recorded on Flipcharts:

- Is maintaining transmission system quality an issue to consider?
- Are we faced with replacing lots of transmission lines?
- Question is how all these issues and the EIS fit into an RTO versus a non-RTO world (assuming EIS primarily focuses on BPA).
- How can the public comment on an EIS with so broad a scope?
- What kind of feedback can the public provide at this stage?
- Issues that are influenced by power issues (i.e. non-wires or adequacy): how will BPA tie these into the EIS?
- Would alternatives include integrated versus non-integrated concepts?
- What would you like from public meetings/today?
- Can we raise questions about issues requiring Congressional action?
- Take public comments for preliminary document before March 31st?
- Is acquisition of high voltage transmission on the table?

- Policy EIS too broad to cover anything.
- The market-driven approach from the business plan is too narrow (what about environmental consideration?).
- As does the BPEIS, this EIS should have a market-driven alternative as well.
- BPA should include an alternative that considers and weights environmental issues (ie. carbon counting/credits). Incorporate environment into decisions.
- Need a feasible environmental alternative.
- Proposed alternative titled: “Do it like everyone else is doing it” by incorporating environment into decisions and considering non-wire solutions.
- Transmission planning must be integrated with generation planning.
- Move forward on RTO.
- Market-driven participant funding translates into benefits to the environment.
- Run the transmission system by least cost to society but account for the costs to the environment.
- Use optimizing exercises/models. Calculate effects to the environment. Use central planning.
- Overlay purposes with cost-based system restrictions (i.e. existing laws).
- One alternative: prioritize aspects of transmission (i.e. cost, reliability, etc.).
- Another alternative: analyze risk levels.
- Another alternative: weight risks (to environment).
- Our brainstormed alternatives seem “right on the mark.” Consider price and reliability of service.
- Look at effects on/of GTAs, Tier I and II; flexibility and access to markets.
- How will we address RTO and FERC issues in EIS?
- Will we do EAs off of this document? (Tiered ROD process?)
- Is BPA looking at specific lines or corridors?
- Will G-20 be covered?
- Tier off for specific projects?
- Address cumulative impacts of G-20?
- How is BPA going to operate the system and for whom?
- How are you going to stop?
- Looking for more a more renewables-friendly policy: make them a requirement to encourage.
- Address energy imbalance? (e.g. for wind 90/110 deadband)
- Will this EIS cover 2006 rate case issues?
- Is TBL considering philosophical questions (e.g. market driven; least cost; operate to meet existing loads)?
- How does TBL capture fish needs?
- Does RTO change (increase) geographical scope of EIS?
- Factor in intermittent firm power (renewables); Non-wire solutions
- Will EIS analyze BPA or region-wide impacts?
- G-20 phased-in approach v/s alternatives.
- Incorporate an energy-friendly policy.
- Adequacy vs. cost.

- Locational pricing: what does it mean? How should it be paid for?
- Who pays for new investments?
- LGIP? Part of EIS? [LGIP = Large Generator Interconnection Procedure]
- Can contract lock proceed without this?
- Will BPA report out on scoping?
- Will this rely on BPEIS? Tied to SOR? Assumptions in BPEIS are dated.
- Which BIOP do we assume?
- Contract locks over contracts, congestion management has stopped. Will these be part of EIS?
- Should consider RTO participation: What will RTO look like?
- TBL rate design.
- Transmission federal and non-federal money.
- Generation investment? Siting, type, running existing resources.
- What happens if Northwestern sells to MDV/Basin?
- Are we looking at specific types of non-wires programs?
- Resolution of GTA issues and signing new GTAs or alternatives to GTAs?
- State policies regarding direct access eligible customer, energy imbalance.
- Is BPA going to define reliability?
- How will reliability legislation impact BPA?
- Competitiveness versus reliability: which is BPA's first priority?

**Transmission Business Policy EIS
Seattle Scoping Meeting
January 14, 2004**

Written comments submitted to comment box:

1. "Please have your environmental studies look at: Making sure that the residents have a slow, gradual understanding of what will be happening near their homes. We understand the need for reliability but we need assurances that we won't lose the quality of our lives as a result of BPA's actions.

I need more information about: A timeline of continued analysis and when possible resolutions will be enacted.

I have these other comments: I don't believe a categorical exclusion is an appropriate process for 'uprating' a line as old as the Sno-King Monroe TAP. There are too many possible problems with such an old line. Too many old components that may not integrate well. A contingency plan needs to be part of any 'uprate' plan where major problems may arise."

2. "Please have your environmental studies look at: thoroughly inspect equipment lines before upgrades. Test before upgrades. Test. Test. It may look okay, but you must test a section or piece. If you did that at Sno-King tap, you would have discovered the problem before impacting 200 residences. Test – inspect – question – test.

I need more information about: the manufacturer of Sno-King tap line, where made, what type of line configuration.

I have these other comments: Test. BPA assumed no impact at Sno-King tap – noise – so test beforehand – no excuse for not testing equipment. Test. Never do categorical exclusions! EIS – test – communicate with neighbors ahead of time.

Mike was great to talk with. Jamae was wonderful.”

3. “Please have your environmental studies look at: Noise impacts associated with upgrades to voltage. Recommended setbacks to minimize noise impacts. EMF studies.”

Comments Recorded on Flipcharts:

- Is there an opportunity to comment on draft EIS?
- Consider meeting location for public meetings (Comfort Suites Seattle hard place to find/get to).
- In a volatile price/transmission environment, consider options for leveling spike costs over time for small customers.
- Public Notices of scoping meetings should indicate format of meeting (i.e. open house format)
- With so many issues facing TBL today (customer needs, restructuring , finances, etc), seems like timing of EIS may be off.
- Will the EIS be binding? Such as honoring contracts in the future?
- What will EIS tell you about what BPA should do?
- Usually have a laundry list of items to consider and comment on at start of process.
- Transmission is now the limiting factor in the utility market, not generation.
- We (customers) pay a lot for transmission, not power. So, TBL should do the best job at the cheapest price. Customer does not like curtailment.
- Will BPA look at price reliability?
- Higher level policies a little nebulous, but will some policies we develop be more detailed?
- There are issues surrounding BPA’s transmission problems that are impeding generation policies (i.e., at Puget Sound Power and Light).
- Will the EIS be used to make decisions on RTO and other issues?
- Will the Record of Decision be binding on the agency?
- How much will RTO be incorporated into the EIS?
- BPA makes decisions and then uses the EIS process to justify its decision after-the-fact.
- Not too fond of letting a RTO handle congestion management.
- BPA has to have adequate transmission to get resources to load.
- Alternatives have to be a mixture of policy objectives.
- What kinds of policies are going to result from the EIS?
- Why is this the time to do this EIS?
- Address integration of resources.
- Need to spread out corridors to address safety issues.
- Joining the RTO would need NEPA—will this document provide coverage?

- Is the Business Plan EIS outdated?
- Get draft alternatives and scoping document out before scoping ends.
- How will the EIS be structured? For instance, will there be a chapter on RTO?
- In the EIS, will BPA recommend doing this over that?
- The list of brainstormed alternatives has pretty well captured the interest groups' concerns (i.e. FERC would support the market-based strategy alternative and Seattle light would support a 'gold-plated reliability' alternative).
- We have to start with existing policies and mandates; how will this document relate to those?
- Will we consider new technologies such as fuel cells?
- We should look at Contract Rights.
- Public needs to have specific alternatives to examine (decisions, policies). What policies are imminent?
- What about informing RTO decisions? Will this really inform us?
- Should BPA stay in the transmission business (have both ownership and operation)?
- Are cut planes just transmission issues or are there other (physical/geographical) issues?
- How will BPA address setbacks, EMF, safety issues in the TBP EIS?
- Will there continue to be a public process?
- Noise is an issue due to the proximity of transmission lines to people.
- There is a slow down on response for wireless carriers' applications for towers.
- Being told it's not a high priority.
- All corridors seeing this (500V).
- What level of reliability should BPA build to?
- Whose contracts go into BPA's planning model?
- Sno-King categorical exclusion was inappropriate level of NEPA evaluation.
- Inspect equipment prior to energizing a transmission line.

**Transmission Business Policy EIS
Spokane Scoping Meeting
January 15, 2004**

Written comments submitted to comment box: None

Comments Recorded on Flipcharts:

- Franchise for BPA use of right-of-way with Spokane County (50 year) is almost up.
- If you aren't a customer of BPA, cost-cutting/saving measures aren't that important. More concerned about aesthetics, EMF, etc. that have an immediate effect on property owner.
- Right of way/lease renewals.
- Open, reliable, affordable transmission services.
- Spokane has adequate transmission now, but BPA needs to maintain that through its policy decisions.
- Does BPA meet local codes when building lines?

- Does BPA share towers?
- Multiple use of land along transmission corridors.
- Need one queue for region. Transmission and GI requests would benefit all parties.
- Anything would be better than power lines (non-wires).
- Noise, health, safety, aesthetics: mitigate whatever is possible.
- Stick with what you do best: provide cheap power.
- Put PBL and TBL back together. Don't comply with FERC in a knee-jerk war.
- EMF standards – adopt new California standards?
- Will policies supported by this EIS have a retroactive effect on existing projects or projects underway?
- Aesthetics – single pole steel towers (pylon towers) are better: pole disappears from field of vision, unlike lattice-structure. Also, they are higher in air, out of field of vision with lower EMF.

**Transmission Business Policy EIS
Helena Scoping Meeting
January 27, 2004**

Written comments submitted to comment box: None

Comments Recorded on Flipcharts:

- To build more generation-wind or coal-need more transmission.
- Need transmission within state as well as out of state.
- Cost/monies: want federal government-WAPA or BPA-to build?
- MFSA-Major Facilities Siting Act: any line over 230kV; doesn't cover generation; megawatt threshold.
- Non-wires alternatives: great but reality is we do need to upgrade the transmission system; it's been a number of years.
- What are chances for federal appropriations instead of needing borrowing authority/treasury payments? What are the benefits and costs?
- What is the environmental baseline of pollutants that is naturally occurring vs. additory? (ex. CO2, sediment)
- Reducing constraints reduces the value for private owners of transmission.
- Air quality, CO2 issues. What programs are set up for mitigation? (carbon sequestration and carbon credits)
- How do you balance open access, non-discrimination policy with setting policy that set societal choices or regional policies?
- New and emerging technology. Fuel cells/hydrogen. Low tech and high tech.
- Pump air into old natural gas wells by using wind power pressurized, then bring it out later for wind power.
- If you eliminate constraints, market will balance. Cut and analyze the effects from that.
- Who pays to get rid of constraint?

- ATC studies, especially MT west or south for wind/coal.
- Develop products/services to better utilize available transmission capacity (ex. Seasonal products).
- Optimize existing system (cost/reliability) then move forward with meeting the need.
- Financing/borrowing authority.
- Merchant transmission companies/venture capital (ex. Path 15).
- Continue public outreach/education efforts—site-specific, regionally, and in the middle—to discuss trade-offs related to power and transmission (social, environmental and economic costs).
- Continued public outreach could mitigate NIMBY ('not in my back yard') if people understand needs.
- Real-time/demand metering—behavioral change (ex. time of day usage; energy/transmission conservation; education, but this may be retail not wholesale; but, we could use price signals).
- Consideration of counter flow (planning process).
- How much will a National Energy Plan affect BPA transmission?
- Federal partners—Corps, BOR—empty bags at Libby? Other options for adding generation in hydro system? What is the relationship to stability of transmission system?
- How would you partner with private parties to get at Federal reliability issues? (cost share)
- BPA/Montana MOA's: What about other states? What about consistency?
- Learn from Kangley-Echo Lake project: benefits/positive aspects.
- Federal agency coordination and tribal coordination for corridor siting/transmission development.
- When undergrounding is a fit, at what cost? What limitations and what reliability?
- BPA: who are we? What is/should be our role?
- Should we take a position on a new DC line? (ex. N. Alberta—look at BC Hydro partnership.)
- Maintain existing or take a leadership role in expansion.
- New control technologies? Hardware? That would increase reliability in Montana?
- DSM as an alternative to build option (decrease peak).
- Use/address "counter flow." Planning? Real time?
- BPA planning to continue or RTO in this role?
- Reliability-Impacts of new technologies that may improve.
- FCRPS-increase generation possibilities, impacts on FCRTS (ex. Increase Libby generation).
- Interstate transmission planning: agencies, social, economics, technology, cooperative effort.
- Federal BPA and Canadian issues and disputes?
- Underground transmission: issues, voltage, uses, costs, reliability and safety.
- Behavioral changes real-time feedback mechanisms (metering).
- Generation diversification: geographic, fuel type.
- Wind: address needs, benefits, location (better sites than others?)
- Robustness/overbuild of transmission system; minimize rates.

- If build: who pays? Direct beneficiaries are who? Direct assign vs. socialize?
- BPA owned or independent owned new transmission? Who's responsible for operation and maintenance?
- AC vs. DC transmission? Option, flexibility, BPA's position on DC alternative (ex. Alberta Oil Sands).
- New technology; impact on AC vs. DC?
- GTA: Preservation of service to 2011 rolled in costs: TBL (no direct assignment)
- Preservation of existing transmission line rights (transmission line, business practices, open access transmission tariff (OATT)).
- Level delivery charge as applied to GTA. Charge if not incurring cost. Ability to avoid purchasing facility.
- Cataloguing transmission line rights.
- Reliability of service (NT and GTA).
- Centralized vs. decentralized generation: impacts and incentives?
- Allocation of cost of lines.
- Socialize cost of transmission for (reliability?), but if not and one party benefits more, they should pay more of the costs. Also, indirect benefits (economic development)
- Costs: which ones are socialized and which ones are directly assigned?
- BPA's role in construction transmission for non-federal generation, meeting non-federal loads.
- What degree is BPA responsible for regional reliability?
- Should BPA be provider of "last resort"?
- Should BPA encourage/discourage/be indifferent to DC development?
- Positive things associated with a corridor-instead of always negative economic and environmental (ex. habitat).
- Mitigation
- Technical aspects of making wind work
- Siting renewables (cost; best place for it).
- Distributed generation/cost/rates vs. non-distributed
- Consider impacts to total cost of energy delivery.